

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

MARY DESMOND, THOMAS ZIOBROWSKI,  
PAUL WATTS on their own behalf and on behalf  
of other participants in the defendant ERISA  
Plans

Plaintiff,

C.A. No. 05-10355NG

v.

MORTON C. BATT, ANTHONY L. SCIALABBA,  
CITISTREET, LLC, WHITE AND WILLIAMS, LLP,  
SCIALABBA & MORRISON, P.C., ANTHONY L.  
SCIALABBA & ASSOCIATES, P.C., THE  
STANDARD AUTOMOTIVE 401(K) PLAN, THE  
STANDARD AUTOMOTIVE EMPLOYER  
CONTRIBUTION PLAN,

Defendants.

**APPLICATION OF DEFENDANT MORTON C. BATT**  
**PURSUANT TO LOCAL RULE 83.5.3(B) FOR ADMISSION**  
**PRO HAC VICE OF MICHAEL KASSAK, ESQ.**

Defendant Morton C. Batt, by and through the below-signed counsel, who is a member of the Bar of this Court and has also filed an Appearance in this matter, hereby applies pursuant to Local Rule 83.5.3(b) for admission of Attorney Michael Kassak, White and Williams LLP, 1800 One Liberty Place, Philadelphia, Pennsylvania. As set forth in the accompanying Certificate of Attorney Kassak, has certified that:

1. He is a member of the Bar in good standing in every jurisdiction where he has been admitted to practice;
2. There are no disciplinary proceedings pending against him as a member of the Bar in any jurisdiction; and

3. He is familiar with the Local Rules of the United States District Court for the District of Massachusetts.

For the reasons stated above, Defendant Morton C. Batt, by the undersigned counsel, respectfully requests that Attorney Michael Kassak, White and Williams LLP, 1800 One Liberty Place, Philadelphia, Pennsylvania, be admitted to practice in this Court in this matter on behalf of Defendant Morton C. Batt.

MORTON C. BATT

By his Attorneys,

/s/ Michael F. Kraemer

Michael F. Kraemer (#657156)  
HINCKLEY, ALLEN & SNYDER LLP  
1500 Fleet Center  
Providence, Rhode Island 02903  
(401) 457-5196

#678094v1 (58872/126497)

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Defendants.

APPLICATION FOR ADMISSION OF  
ATTORNEY MICHAEL KASSAK, ESQ. PRO HAC VICE

Pursuant to L.R., D. Mass. 83.5.3, Michael Kassak, an active member in good standing of the bars of the State of New Jersey and the Commonwealth of Pennsylvania, hereby applies for admission to practice in the United States District Court for the District of Massachusetts on a *pro hac vice* basis, representing Morton C. Batt in the above entitled case.

In support of this application, I certify on oath that:

1. I am an active member of the Pennsylvania and New Jersey bars, as indicated above.
2. I am a member of the bar in good standing in every jurisdiction where I have been admitted to practice;
3. There are no disciplinary proceedings pending against me as a member of the bar in any jurisdiction;

4. I am familiar with the Local Rules of the United States District Court for the District of Massachusetts.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 28th day of September, 2005.

/s/ Michael Kassak  
Michael Kassak

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